



Contaminant Screening Study Libby Asbestos Site, Operable Unit 4 Libby, Montana

Final Sampling and Analysis Plan (SAP) Addendum
For the Cemetery Park Ball Fields

July 2002



*Sampling and Analysis Plan
Addendum*

**Response Action Contract
for Remedial, Enforcement Oversight, and Non-Time
Critical Removal Activities at Sites of Release or
Threatened Release of Hazardous Substances
in EPA Region VIII**

U.S. EPA Contract No. 68-W5-0022

**Final Sampling and Analysis Plan (SAP)
Addendum for the Cemetery Park Ball Fields,
Contaminant Screening Study,
Libby Asbestos Site, Operable Unit 4**

July 31, 2002

**Work Assignment No.: 116-RIRI-08BC
Document Control No.: 3282-116-PP-SAMP-15253**

**Prepared for:
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500
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**Prepared by:
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1331 17th Street, Suite 1050
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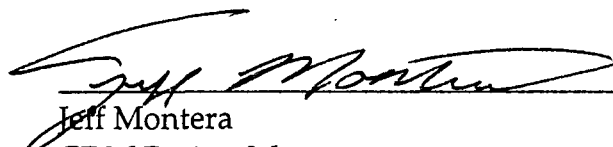
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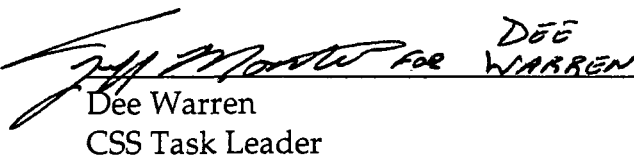
Prepared by:


Jeff Montera

CDM Project Manager

Date: July 31, 2002

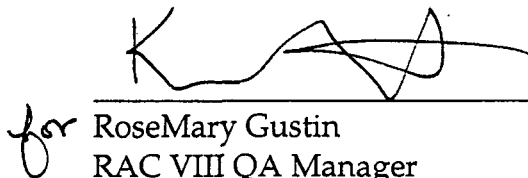
Reviewed by:


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Date: July 31, 2002

Reviewed by:


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RAC VIII QA Manager

Date: 7/31/02

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Date: 7/31/02

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Site Specific Plan for Conducting the Contaminant Screening Study at the Cemetery Park Ball Fields

This addendum outlines the site-specific requirements to conduct the contaminant screening study (CSS) at the Cemetery Park Ball Fields. All rationale, data quality objectives, quality assurance procedures, and standard operating procedures (SOP) from the CSS sampling and analysis plan (SAP) still apply (CDM 2002).

1.1 Site Location/Site History

Four baseball fields currently exist within Cemetery Park located adjacent to the Montana National Guard Armory off Crotteau Road (Figure 1). The City of Libby owns the property, but currently leases it to Mr. Cameron Foote.

According to Mr. Foote, prior to the construction of the baseball fields, the area was undeveloped and mostly under water (i.e., swamp). In 1995, the city began to backfill this area with a variety of materials (e.g., riprap and common fill) in order to use this area for future development. Mr. Foote suspects that the fill material may have originated from the mine (i.e., Vermiculite Mountain) and contain Libby amphibole (LA) asbestos. It is estimated that approximately two to three feet of riprap and three to five feet of common fill was used as backfill throughout the entire area. Overlying this material is approximately 6 to 8 inches of topsoil that originated from the Libby Baptist Church yard. Gravel was used to finish two parking lots and a pedestrian walkway that extends between the four ball fields (Figure 2). The origin of the gravel is currently unknown.

EPA requested that CDM collect surface soil samples at the ball fields in May based on concerns of children being potentially being exposed to asbestos during the upcoming baseball season. On May 6 2002, CDM collected a total of twelve surface soil samples (0-4 inches) from the four ball fields (Figure 2). Each ball field had three samples, each consisting of five composites (Attachment 1 – Field Sample Data Sheets and Logbook pages). The results from the polarized light microscopy (PLM) analysis indicated no detectable asbestos in any of the twelve surface samples (Attachment 2 – EMSL results).

1.2 Objectives

The objective of this addendum is to present a site-specific sampling plan to conduct the CSS at the Cemetery Park Ball Fields.

1.3 Field Screening and Sampling Activities

CSS activities at the Cemetery Park Ball Fields will consist of a verbal interview, visual inspection, and soil sampling.

1.3.1 Verbal Interview

A verbal interview to discuss concerns and obtain historical information about the ball fields was held on January 14, 2002 with the current lessee, Cameron Foote. Thomas Cook and Brad Cook were present at this meeting for CDM.

1.3.2 Visual Inspection

The field team will conduct an inspection for visible vermiculite of all of the sub-areas (i.e., ball fields, walkways, parking lots, and wooded areas). Soil samples will not be collected from any areas where visible vermiculite product is observed. Instead, the team will record specific details in the field logbook and on the property sketch portion of the information field form including location of contaminated source; approximate volume by estimating and noting source location length, width, and depth observed during sampling (depth will only be the depth observed during sampling and no additional effort will be conducted to determine the depth below ground surface to which the source extends); estimated percentage of product; and anecdotal estimates of how long the contaminated source material has existed on the property.

1.3.3 Soil Sampling

The soil sampling process will involve the following steps:

- Sketch sampling location
- Determine composite sample locations
- Collect samples
- Record sample locations using global positioning system (GPS) equipment

Sketch Property

A site layout sketch of each sub-area will be drawn prior to sampling. This sketch will include major features (e.g., trees, drainage ditches, utility poles, etc.) and sampling locations. The site layout sketch will be completed on the IFF.

Determine Sampling Locations

The major features of Cemetery Park include four ball fields, two parking lots, a gravel walkway, and a wooded area adjacent to the ball fields. For sampling purposes, each feature has been divided into separate sampling locations (Figure 2).

Surface soil samples will extend from the surface to approximately 4 inches below ground surface. Subsurface soil samples will advance from the topsoil/fill interface (approximately 8 in.) to 1.5 feet below ground surface. All samples (surface and subsurface) will consist of a 5-point (pt) composite sample. The 5-pt composite sample will consist of a center subsample and four additional subsamples within the designated area. The four subsequent subsamples will be collected within the given area that will provide the best representation (i.e., linear and/or equidistant from

each other). While surface and subsurface soil samples will be co-located, they will be individually collected (i.e., individual surface and subsurface composite samples).

Each of the two parking lots is divided into two sections (Figure 2). One 5-pt surface and one 5-pt subsurface sample will be collected from each section of the two parking lots. One 5-pt subsurface sample will be collected from each ball field. No further surface samples will be collected at any of the ball fields. The gravel walkway is divided into two sections. One linear 5-pt composite surface sample will be collected from each section. The wooded area below ball field #2 is divided into two sections. One 5-pt composite surface sample and one 5-pt composite subsurface sample will be collected from each section. Therefore, a total of 8 surface composite and 10 subsurface composite samples will be collected as part of this characterization (Table 1).

Table 1: Cemetery Park Ball Field Sample Count

	Surface Samples	Subsurface Samples
Parking Lots	4	4
Ball Fields	0	4
Gravel Walkway	2	0
Wooded Area	2	2
Total	8	10

Collect Samples

All soil samples will be collected in accordance with SOP CDM-LIBBY-05, Site-Specific Standard Operating Procedure for Soil Sample Collection. The PPE required for the fieldwork is detailed in the HASP (Appendix B).

Record GPS Locations

For each sample collected, a GPS point will be recorded. All necessary information will be entered into the GPS data dictionary.

Location identification numbers will be assigned for each sample location. Location identification numbers will include sample point location identification numbers (SP) numbers, as discussed below. GPS points will be collected for each soil sample location, and the location identification number associated with the sample point will be in the form of SP-#####.

1.4 Sample Analysis and Data Validation

Soil samples will be analyzed for LA by the IR method (ISSI-LIBBY-02). Depending on sample results, a sample split may be submitted for analysis using the SEM method (Asbestos Analysis of Soil by Scanning Microscopy and Energy Dispersive X-Ray Spectroscopy, Revision 0, May 6, 2002). The process describing when and how many SEM splits are submitted for analysis is described in Section 7.

References

CDM. 2002. Final Sampling and Analysis Plan, Remedial Investigation, Contaminant Screening Study. April.

Color Map(s)

The following pages
contain color that does
not appear in the
scanned images.

To view the actual images, please
contact the Superfund Records
Center at (303) 312-6473.

Libby, Montana
Cemetery Park Ballfield

Figure 1

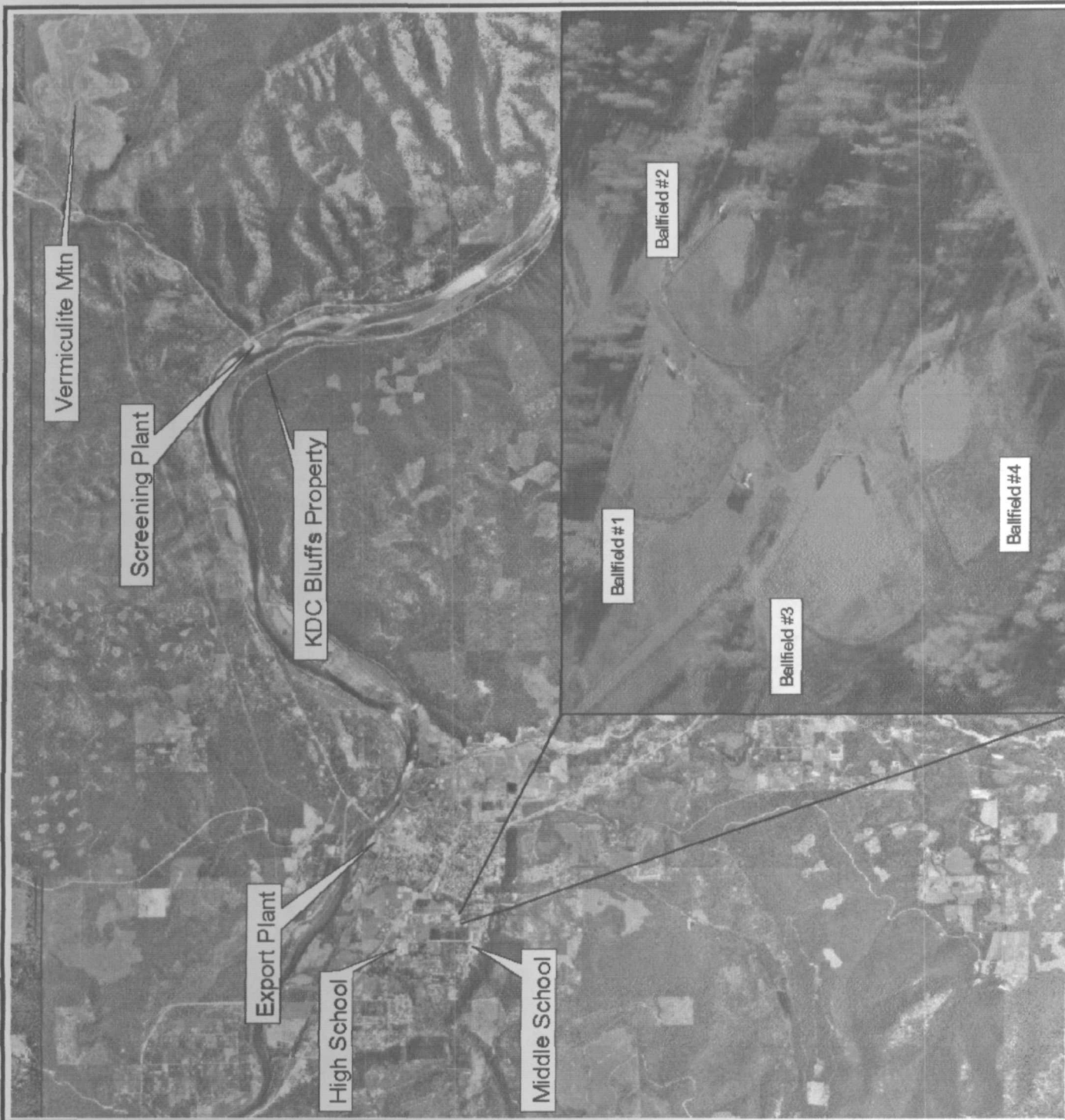


Map Produced July 2, 2002
Map Projection UTM Zone 11 NAD83 FT
* Inset not to scale.



CDM

0.5 0 0.5 Miles



Libby, Montana

Cemetery Park
Ball Fields

Asbestos Levels
In Soil (by PLAM)

Figure 2

Surface Samples

- No Data
- ND
- < 1%
- 1%
- 2%
- 3%
- 4%
- > 5%

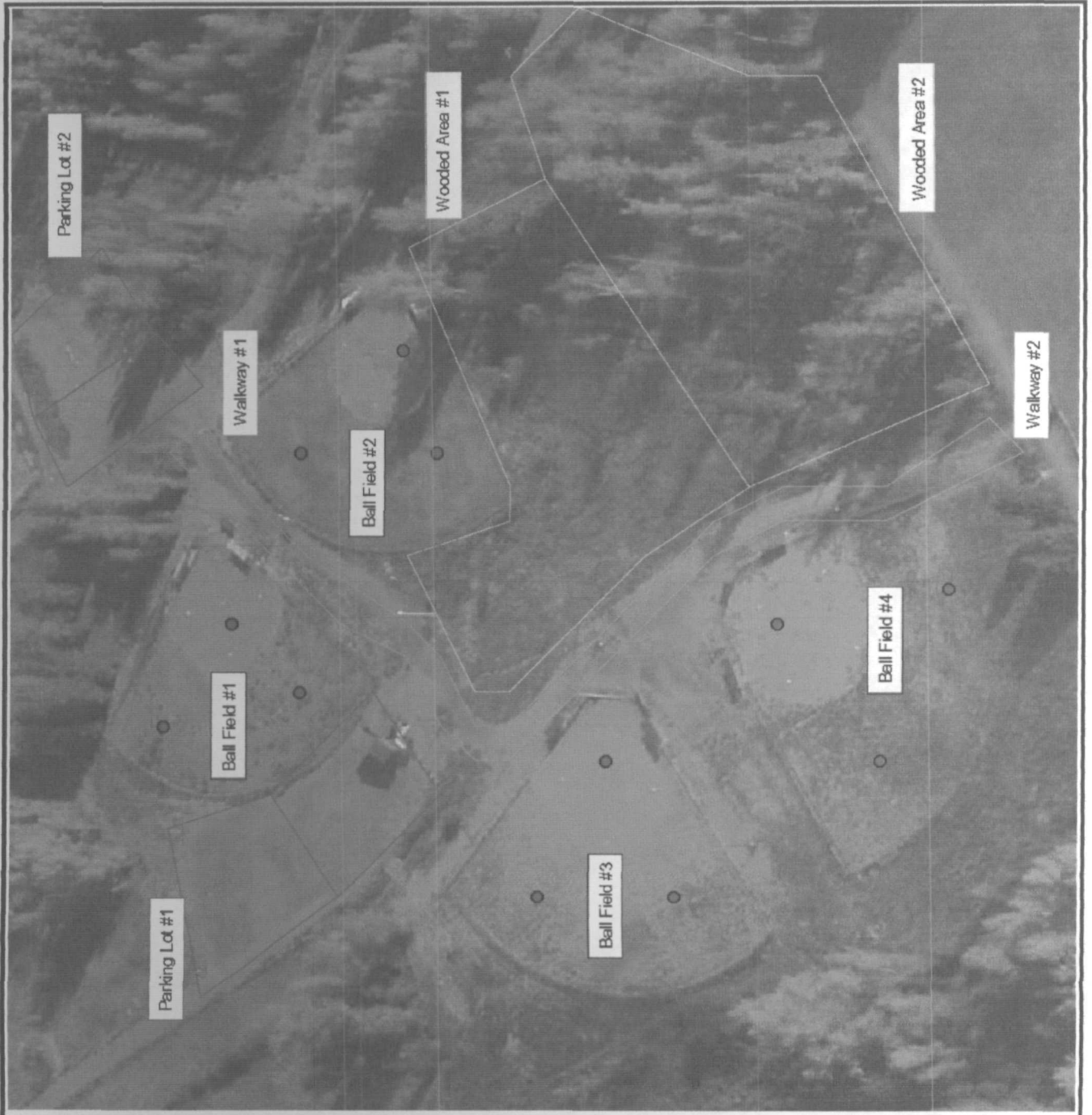


Map Produced July 2, 2002



CDM

Approx. 100 Feet



Attachment 1

**Field Sample Data Sheets and Logbook pages from the
May 6, 2002 Surface Soil Sampling Event at the Libby
Cemetery Park Ball fields**

Sheet No. S- 001107LIBBY MONTANA FIELD SAMPLE DATA SHEET
SOIL-LIKE MATERIALSScenario No. Phase 1 Field Logbook No. 100056 Page No. 21-22 Sampling Date: 5/6/02Address: Libby Community Ball Fields 1-4 Owner/Tenant: CityLand Use: (circle) Residential School Commercial Mining Roadway Other ()Sampling Team: (circle) CDM PES Other _____ Names: Pyles/Warren

Data Item	Sample 1	Sample 2	Sample 3
Index ID	1-06599	1-06600	1-06601
Location ID			
Sample Group	<u>Property</u>	<u>Property</u>	<u>Property</u>
Location Description (circle)	Yard Soil Garden Soil Play Area Driveway <u>Other Field 1 infield</u>	Yard Soil Garden Soil Play Area Driveway <u>Other Right Field to center</u>	Yard Soil Garden Soil Play Area Driveway <u>Other Left Field to center</u>
Category (circle)	<u>FS</u> FD _____	<u>FS</u> FD _____	<u>FS</u> FD _____
Matrix Type (circle)	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____
Type (circle)	Grab <u>Comp</u> # subsamples <u>5</u>	Grab <u>Comp</u> # subsamples <u>5</u>	Grab Comp. # subsamples <u>5</u>
Sample Time	<u>1000</u>	<u>1015</u>	<u>1030</u>
Top Depth (in.)	<u>0</u>	<u>0</u>	<u>0</u>
Bottom Depth (in.)	<u>4</u>	<u>4</u>	<u>4</u>
Map Location	<u>Infield of Field 1</u>	<u>Right to Center Field</u>	<u>Left to Center Field</u>
Field Comments	No product visible	No product visible	No Product Visible
	Entered _____ Validated _____	Entered _____ Validated _____	Entered _____ Validated _____

406/293
3567

Sheet No S- 001103

LIBBY MONTANA FIELD SAMPLE DATA SHEET

SOIL-LIKE MATERIALS

Scenario No.: Phase 1 Field Logbook No: 100056 Page No: 23-24 Sampling Date: 5/6/02

Address: Libby Community Ball Field #4 Owner/Tenant: City
☒ Right of Way ☐ Other ()

Sampling Team: (circle) CDM PES Other _____ Names: Ayles/Henderson

Data Item	Sample 1	Sample 2	Sample 3
Index ID	1-06602	1-06603	1-06604
Location ID			
Sample Group	<u>Property</u>	<u>Property</u>	<u>Property</u>
Location Description (circle)	Yard Soil Garden Soil Play Area Driveway <u>Other Right Field</u>	Yard Soil Garden Soil Play Area Driveway <u>Other Left Field</u>	Yard Soil Garden Soil Play Area Driveway <u>Other In Field</u>
Category (circle)	<u>FS</u> FD _____	<u>FS</u> FD _____	<u>FS</u> FD _____
Matrix Type (circle)	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____
Type (circle)	Grab <u>Comp</u> # subsamples <u>5</u>	Grab <u>Comp</u> # subsamples <u>5</u>	Grab <u>Comp</u> # subsamples <u>5</u>
Sample Time	<u>1045</u>	<u>1100</u>	<u>1115</u>
Top Depth (in.)	<u>0</u>	<u>0</u>	<u>0</u>
Bottom Depth (in.)	<u>4</u>	<u>4</u>	<u>4</u>
Map Location	<u>Right Field to Center</u>	<u>Left Field to Center</u>	<u>In Field</u>
Field Comments	<u>No Visible Product</u>		
	Entered _____ Validated _____	Entered _____ Validated _____	Entered _____ Validated _____

Sheet No: S- 00100LIBBY MONTANA FIELD SAMPLE DATA SHEET
SOIL-LIKE MATERIALSScenario No.: Phase 1 Field Logbook No: 100056 Page No: 24 Sampling Date: 5/6/02Address: Libby Community Ball Fields Owner/Tenant: CityLand Use (circle) Residential School Commercial Mining Roadway Other ()Sampling Team (circle) CDM PES Other _____ Names: Ayles/Henderson

Data Item	Sample 1	Sample 2	Sample 3
Index ID	1-06605	1-06606	1-06607
Location ID			
Sample Group	<u>Property</u>	<u>Property</u>	<u>Property</u>
Location Description (circle)	Yard Soil Garden Soil Play Area Driveway <u>Other</u> <u>Right Field</u>	Yard Soil Garden Soil Play Area Driveway <u>Other</u> <u>Left Field</u>	Yard Soil Garden Soil Play Area Driveway <u>Other</u> <u>Infield</u>
Category (circle)	<u>FS</u> FD _____	<u>FS</u> FD _____	<u>FS</u> FD _____
Matrix Type (circle)	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____
Type (circle)	Grab <u>Comp</u> # subsamples <u>5</u>	Grab <u>Comp</u> # subsamples <u>5</u>	Grab <u>Comp</u> # subsamples <u>5</u>
Sample Time	<u>1125</u>	<u>1135</u>	<u>1145</u>
Top Depth (in.)	<u>0</u>	<u>0</u>	<u>0</u>
Bottom Depth (in.)	<u>4</u>	<u>4</u>	<u>4</u>
Map Location	<u>Right Field to Center</u>	<u>Left Field to Center</u>	<u>Infield</u>
Field Comments	<u>No visible Product</u>		
	Entered _____ Validated _____	Entered _____ Validated _____	Entered _____ Validated _____

Sheet No. S- 001110

LIBBY MONTANA FIELD SAMPLE DATA SHEET

SOIL-LIKE MATERIALS

Scenario No.: Phase 1 Field Logbook No: 100056 Page No: 25 Sampling Date: 5/6/02

Address: Libby Community Ball Fields 1-4 Owner/Tenant: City

Land Use: (circle) Residential School Commercial Mining Roadway Other

Sampling Team: (circle) CDM PES Other _____ Names: Pyles/Henderson

Data Item	Sample 1	Sample 2	Sample 3
Index ID	1-06608	1-06609	1-06610
Location ID			
Sample Group	<u>Property</u>	<u>Property</u>	<u>Property</u>
Location Description (circle)	Yard Soil Garden Soil Play Area Driveway <u>Other Right Field</u>	Yard Soil Garden Soil Play Area Driveway <u>Other Left Field</u>	Yard Soil Garden Soil Play Area Driveway <u>Other Infield</u>
Category (circle)	<u>FS</u> FD _____	<u>FS</u> FD _____	<u>FS</u> FD _____
Matrix Type (circle)	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____	Mining Waste Subsurface Soil <u>Surface Soil</u> Fill Other _____
Type (circle)	Grab <u>Comp.</u> # subsamples <u>5</u>	Grab <u>Comp.</u> # subsamples <u>5</u>	Grab <u>Comp.</u> # subsamples <u>5</u>
Sample Time	<u>8:30</u> <u>1155</u>	<u>8:30</u> <u>1210</u>	<u>8:30</u> <u>1220</u>
Top Depth (in.)	<u>0</u>	<u>0</u>	<u>0</u>
Bottom Depth (in.)	<u>4</u>	<u>4</u>	<u>4</u>
Map Location	<u>Right Field to Center</u>	<u>Left Field to Center</u>	<u>Infield</u>
Field Comments	<u>No Visible Product</u>		
	Entered _____ Validated _____	Entered _____ Validated _____	Entered _____ Validated _____

Libby Community Ball Fields 5/6/02
JOLPE Center / EPA

0700 meeting @ CDM office.

- Weather Sunny 50°F
- PAF Level 10
- B. Pyles + D. Warren sampling today.

- Sampling Libby Ball Fields 1-4
will be taking 5 point composite in infield
of each ball field + dividing outfield
of each ball field in Middle @ Center
field and each section will have 5
point composite taken.

Sampling will go as follows:

1000 Sampling begins on Field 1;

1-06599

Sample of ball field
infield.

No product visible

0-4" 5pt Composite

1015 1-06600

Sample of Right Field
to Center field.

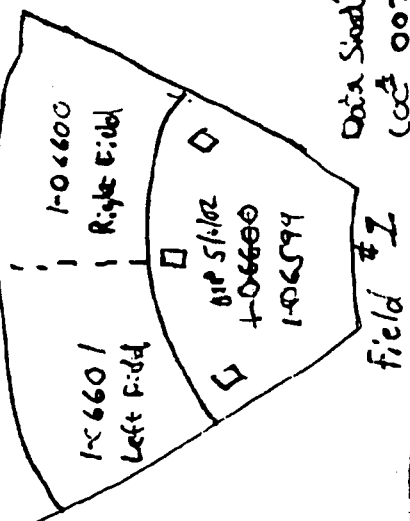
No product visible

0-4" 5pt Composite

B. Pyles

1030 1-06601 Left Field to Center Field

No product Visible
0-4" Sprint Composite.



1045 Ball Field #2

1-06602

Right Field to Center Field #2

0-4" Sprint Composite.
No product Visible

1100 1-06603

Left Field to Center Field #2

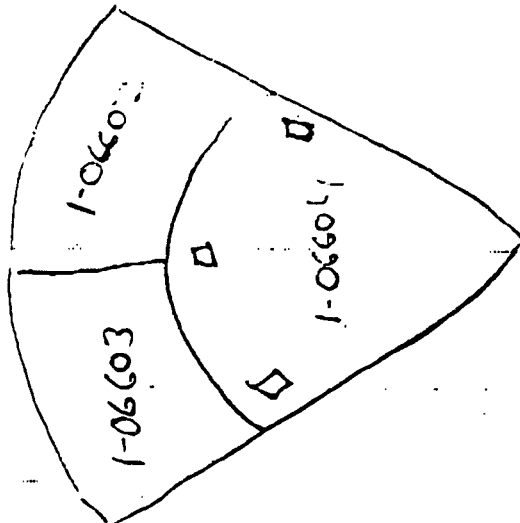
0-4" Sprint Composite.
No product Visible

1115 1-06604 Infield #2

No Visible Material
0-4" Sprint Composite

Sample Data Sheet # 001108
COC # 002520

Libby Ball Field #2



Jim A. Vito

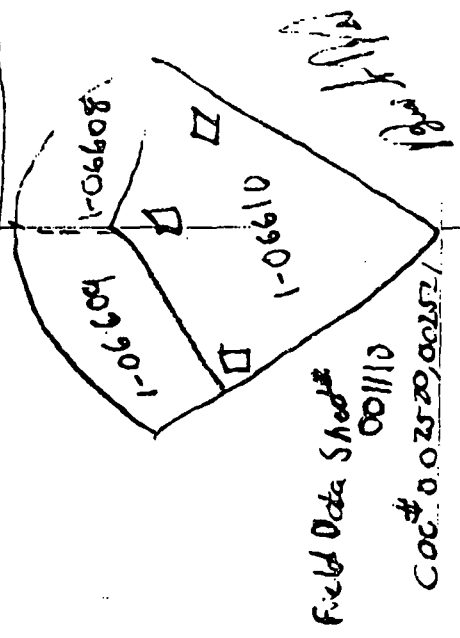
United States Environmental Protection Agency
Volpe Center/EPA

Field #4

1155 1-06608
Right Field to center
Field #4
0-4" 5 point Composite
No Product Visible

1210 1-06609
Left Field to center
Field #4
0-4" 5 point Composite
No Product Visible

1220 1-06610
Infield Field #4
0-4" 5 point Composite
No Product Visible



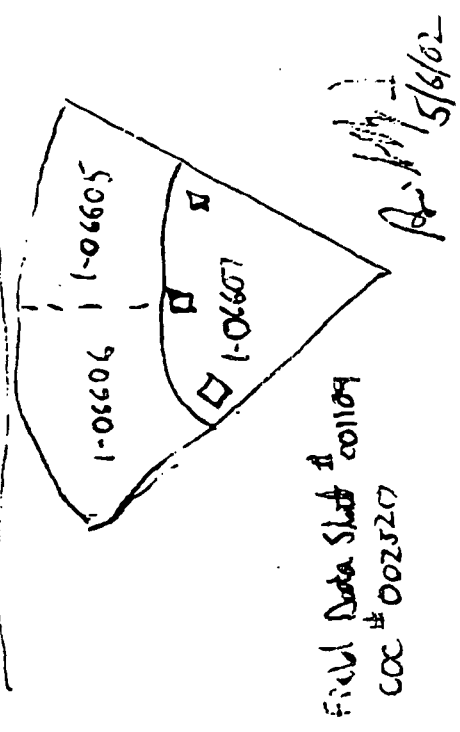
United States Environmental Protection Agency
Volpe Center/EPA

Ball Field #3

1125 1-06605
Right Field to center
Field #3
0-4" 5 point Composite
No Product Visible

1135 1-06606
Left Field to center
Field #3
0-4" 5 point Composite
No Product Visible

1145 1-06607
Infield Field #3
0-4" 5 point Composite
No Product Visible



Attachment 2

Analytical Results from the May 6, 2002 Surface Soil Sampling Event at the Libby Cemetery Park Ball Fields

EMSL Analytical, Inc.

107 West 4th Street, Libby, MT 59723

Phone: 406-233-0066 Fax: Email: mobileasbestoslab@emsl.com

EMSL

Attn: Anni Autio
CDM Federal Programs Corp.
ONE CAMBRIDGE CENTER
50 HAMPSHIRE ST.
CAMBRIDGE, MA 02142

Fax: (617) 452-8257

Phone: 617-452-6257

Project: 002520

Customer ID: DRESS1

Customer PO:

Received: 05/08/02 2:12 PM

EMSL Order: 270200045

EMSL Project ID: Libby, Montana EPA Project

Analysis Date: 5/7/2002

*Libby ball field samples***Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2**

Sample	Location	Appearance	Treatment	Non-Asbestos		Asbestos
				% Fibrous	% Non-Fibrous	% Type
1-00000 270200045-0001	(1-06599)	Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1-00000 270200045-0002	(1-06600)	Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven	10% Cellulose	90% Non-fibrous (other)	None Detected
1-00000 270200045-0003	(1-06601)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven	10% Cellulose	90% Non-fibrous (other)	None Detected
1-00000 270200045-0004	(1-06602)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven	7% Cellulose	93% Non-fibrous (other)	None Detected
1-00000 270200045-0005	(1-06603)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven	5% Cellulose	95% Non-fibrous (other)	None Detected
1-00000 270200045-0006	(1-06604)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1-00000 270200045-0007	(1-06605)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven	1% Cellulose	99% Non-fibrous (other)	None Detected

Analyst(s)

Anna Marie Gooden (10)

or other approved signatory

Disclaimer: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Thus negative PLM results cannot be guaranteed. EMSL suggests that samples reported as <1% or none detected be tested with either SEM or TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

EMSL Analytical, Inc.

107 West 4th Street, Libby, MT 59923

Phone: 406-283-0066 Fax: Email: mobileasbestoslab@emsl.com**EMSL**

Attn: Anni Autio
 CDM Federal Programs Corp.
 ONE CAMBRIDGE CENTER
 50 HAMPSHIRE ST.
 CAMBRIDGE, MA 02142

Customer ID: DRESS1

Customer PO:

Received: 05/06/02 2:12 PM

Fax: (617) 452-8257

Phone: 617-452-8257

EMSL Order: 270200045

EMSL Project ID: Libby, Montana EPA Project

Analysis Date: 5/7/2002

Project: 052520

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2*Libby ballfield samples*

Sample	Location	Appearance	Treatment	Non-Asbestos		Asbestos
				% Fibrous	% Non-Fibrous	% Type
1-055006 270200045-0006	(1-0606)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1-055007 270200045-0007	(1-0607)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1-055008 270200045-0010	(1-0608)	Gray Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected

Analyst(s)

Anne Marie Gooden (10)

or other approved signatory

Disclaimer: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Thus negative PLM results cannot be guaranteed. EMSL suggests that samples reported as <1% or none detected be tested with either SEM or TEM. The above test report returns only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

PLM-1

EMSL Analytical, Inc.

107 Wool 4th Street, Libby, MT 59923

Phone: 406-293-9055 Fax: Email: mobile@emsl.com

EMSL

Attn: Armit Auto
 CDM Federal Programs Corp.
 ONE CAMBRIDGE CENTER
 50 HAMPSHIRE ST.
 CAMBRIDGE, MA 02142

Fax: (617) 452-9257

Phone: 617-452-8257

Project: 002521, 002523

Customer ID: DRESS1

Customer PO:

Received: 05/07/02 3:12 PM

EMSL Order: 270200082

EMSL Project ID: Libby, Montana EPA Project

Analysis Date: 5/8/2002

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2

Sample	Location	Appearance	Treatment	Non-Asbestos		Asbestos
				% Fibrous	% Non-Fibrous	% Type
1-06609 270200052-0001	Libby ballfield scraps	Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven	1% Cellulose	98% Non-fibrous (other)	None Detected
1-06810 270200052-0002		Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1R-13758 270200052-0003		Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1R-13780 270200052-0004		Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1R-13781 270200052-0005		Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1R-13762 270200052-0006		Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected
1R-13763 270200052-0007		Tan Non-Fibrous Heterogeneous	*See comment CDM LAB: EMSL27 dried in oven		100% Non-fibrous (other)	None Detected

Analyst(s)

Anne Marie Gooden (9)

Disclaimer: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos
 samples reported as free of asbestos detected by testing with either SEM or TEM. This does not report results
 without written approval by EMSL. The above test must not be used by the client to claim product endorsement
 is not responsible for the accuracy of results when requested to physically separate and analyze layered sam

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